

### **REMARKS/ARGUMENTS**

In response to the Final Office Action dated April 20, 2008, the Applicant offers the following submissions.

#### **35 U.S.C. §103 - Claims 1 and 5**

Claims 1 and 5 stand rejected as obvious in light of US application 2002/0180834 to Silverbrook in view of US application 2002/0005878 to Moon.

The Applicant respectfully submits that the Silverbrook and Moon documents do not qualify as references under the provisions of §103. In the Response to Arguments on page 6 of the Final Report, the Examiner asserts that the claims do not limit how the modules are removably mounted to the casing, as long as they are mounted to the casing.

With respect, this is plainly incorrect. Claim 1 requires “that each of the printhead modules are *arranged to be individually mounted and detached from the casing as single modular components*” (emphasis added). This is a functional limitation on the modules and one that has not been met by either of the cited references. The standard of anticipation for a citations under §103 is that all claim elements are explicitly disclosed or merely common trade variants. Silverbrook and Moon do not meet this threshold.

If the Examiner argues that Silverbrook teaches a module with at least two printhead ICs (46), a support frame (PCB 42), a support member attached to the support frame (ink reservoir moldings 70 corresponding to each of the modules 46) and casing (Invar channel 62) to mount the modules in linearly aligned relationship, then it is apparent that this module is not *individually mounted and detached from the casing as a single modular component*.

Functional restrictions are a well established and legitimate form of defining the invention. The citations do not disclose printhead modules with the functional requirements of claim 1.

The cited references do not teach all the elements of claim 1 or claim 5. Accordingly, the citations do not support a §103 rejection of claims 1 or 5.

**35 U.S.C. §103 – Claim 2**

Claim 2 stands rejected as obvious in light of ‘834 to Silverbrook and ‘878 to Moon in view of US 5,658,158 to Milan.

As discussed above, ‘834 and ‘878 fail to disclose a module with all the elements and functional capabilities defined by claim 1. The disclosure in Milan also fails to teach or suggest these elements. As claim 2 incorporates these elements by virtue of its indirect dependence from claim 1, it is clear that the citations fail to support a rejection on the basis of §103.

**35 U.S.C. §103 – Claim 3 and 4**

Claims 3 and 4 stand rejected as obvious in light of ‘834 to Silverbrook and ‘878 to Moon in view of US 5,658,158 to Milan and US 6,180,002 to Higgins.

As discussed above, ‘908 and Milan fail to teach or suggest several elements defined in claim 2. The disclosures in Higgins and ‘834 also fail to teach or suggest these elements. As claims 3 and 4 incorporate these elements by virtue of indirect dependence from claim 2, it is clear that the citations fail to support a rejection on the basis of §103.

**Conclusion**

It is respectfully submitted that the Examiner's rejections have been successfully traversed and the application is now in condition for allowance. Accordingly, favorable reconsideration is courteously solicited.

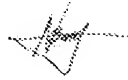
Very respectfully,

Applicant/s:



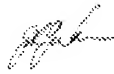
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